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ORIGINAL

April 3, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W. Room TWD204
Washington, DC 20544

Re: In the Matter of Numbering Resources Optimization, CC Docket No. 99-200/ Ex Parte File

Dear Ms. Salas:

Please include the enclosed document in the ex parte file for the proceeding referenced above. This document contains information supplementary to our October 10, 2000 ex parte filing in the same proceeding.

If you have any questions, please communicate with the undersigned.

Sincerely,

Raymond L. Strassburger
Vice President, Global Government Relations,
Telecom, Internet and Advanced Technology Policy

RLS/kc

Enclosures

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CC Docket No.99-200, Ex Parte File

The FCC discussed the expansion of the fourth digit ("D" digit) in a ten-digit telephone number (NPA-NXX-XXXX) in the "Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200", FCC 00-429 released December 29, 2000.

The FCC declined to permit expansion of the "D" digit value for assignable central office codes to include 0 and 1. The FCC directed carriers to begin identifying and eliminating specialized uses of 0 and 1 as the "D" digit in anticipation of the eventual release of the "D" digit. This directive is in Paragraph 106 of the order.

Nortel Networks filed an Ex Parte on October 10, 2000 in regards to the uses of codes in the 000-199 range. This filing is a further clarification of Nortel Networks' position.

The original defined format of the North American Numbering Plan, and all subsequent re-definitions, excluded codes in the range of 000-199. The uses of digits 0 and 1, in the "D" digit position, utilizes these codes. The definitions and intent of the uses of the NANP requires some further clarification of codes 000-199.

The definition of a NANP Number contains two codes and four "station numbers". The combination of the two codes forms the basis by which the North American Public Switched Telephone Network routes and rates (billing) telephone messages. The original NANP format had different formats for the two codes used in a NANP Number. Subsequent re-definitions of the NANP have created a format that defines the format of these codes in exactly the same manner. **The basic design generic requirements used by switch vendors and OSS vendors are based upon the fact that the codes 000-199 are not customer dialable.**

The industry has always needed codes in the same basic format and length for use in the telephone industry to perform functions compatible with the functionality of switching and billing systems. Most of these codes are not dialable by telephone users. Since the codes 000-199 are not part of the defined NANP format, these codes fill the need. In addition, switching and billing systems have checks to block or alert companies that a non-valid number has entered the system.

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Prior to the MFJ, the PSTN routed long distance calls based upon the first three digits. In the home area code of the switch (HNPA), switches translated the first six digits of the ten-digit number to determine whether the call was local, short haul long distance or long haul long distance. Dialing of less than 10 digits was allowed to minimize the provisioning of analog switching equipment. In the instance of seven digit dialing, translation was/is still performed by the analysis of the first three digits. This is done to shorten the analysis time to minimize any delay in call set up.

In addition, access codes are used by the industry to direct calls to specific call types, features or service providers. Switching system digit analysis cannot deal with multiple uses of the same digits. Industry definitions and generic requirements went to great lengths to prevent multiple uses of the same codes. The exclusion of codes starting with a 0 or 1 fulfills this requirement. This includes all codes in the range 000-199.

After the break up of AT&T in 1984, access billing agreements necessitated the elimination of non-working codes from being switched over the PSTN. This created the need to change end office translations from three digits to six digits. Stored program digital switching machines have the speed and memory capability to handle this increased requirement. Simply stated, this expansion in translation requirements uses the three-digit algorithm twice to satisfy the six-digit requirement.

Even though AT&T Network Planning defined some of the uses of codes 000-199, they did not manage these uses. The management of these codes was left up to the telephone companies. When Bellcore functioned as the NANPA, they did not manage these codes. NeuStar only administers the codes that were/are in the range of 200-999.

In order for the "D" digit to be a 0 or 1, the NANP must be redefined to allow codes in the range of 000-199 to be utilized. The industry must reach consensus on this re-definition and create a managed resource for the present non-dialable uses of these codes.

Generic Requirements, for switch vendors and OSS vendors, to use in the re-design of code analysis must be produced before the industry can be begin the process of using these codes.